



---

O'MELVENY & MYERS LLP

BEIJING  
BRUSSELS  
CENTURY CITY  
HONG KONG  
LONDON  
LOS ANGELES  
NEWPORT BEACH

Times Square Tower  
7 Times Square  
New York, New York 10036-6524  
TELEPHONE (212) 326-2000  
FACSIMILE (212) 326-2061  
WWW.OMM.COM

SAN FRANCISCO  
SEOUL  
SHANGHAI  
SILICON VALLEY  
SINGAPORE  
TOKYO  
WASHINGTON, D.C.

July 26, 2016

WRITER'S DIRECT DIAL  
(212) 728-5864

**VIA ECF**

WRITER'S E-MAIL ADDRESS  
sackerman@omm.com

The Honorable Pamela K. Chen  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East, Chambers N 631  
Brooklyn, New York 11201

**Re: Sammy Rodgers v. American Airlines, Inc. et al.,**  
**Case No. 1:16-cv-00731-PKC-RER (E.D.N.Y.)**

Dear Judge Chen:

Pursuant to Your Honor's July 19, 2016 Order, Defendants American Airlines, Inc. and Association of Professional Flight Attendants submit this joint letter proposing the following briefing schedule for their motions to dismiss.

- Defendants must file their motions to dismiss by August 26, 2016.
- Plaintiff must file his oppositions to such motions by September 16, 2016.
- Defendants must file their reply briefs in support of such motions by September 30, 2016.

O'MELVENY & MYERS LLP

July 26, 2016 - Page 2

Respectfully submitted,

/s/ Sloane Ackerman

for O'MELVENY & MYERS LLP  
Counsel for Defendant American Airlines, Inc.

/s/ Adam Bellotti

for BREDHOFF & KAISER, PLLC  
Counsel for Defendant Association of  
Professional Flight Attendants

cc: Sammy Rodgers (via Federal Express and e-mail)  
Counsel of Record (via ECF)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SAMMY RODGERS,  
Plaintiff,  
-against-  
AMERICAN AIRLINES, INC.,  
ASSOCIATION OF PROFESSIONAL  
FLIGHT ATTENDANTS,  
DIVINE & SERVICE LTD. a/k/a  
D&S GLOBAL SOLUTIONS LTD.,  
Defendants.

Civil Action No. 1:16-cv-00731-PKC-RER

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 26, 2016, the foregoing document was served on Plaintiff, via Federal Express overnight delivery and email, to: Sammy Rodgers, 2201 South Broadway Street, Little Rock, Arkansas 72206 (Telephone: 718-509-9288; Email: milktrain@live.com).

Dated: New York, New York  
July 26, 2016

By: /s/ Sloane Ackerman  
Sloane Ackerman